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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RONALD P. GURITZKY

Defendant.

Adv. Pro. No. 10-04318 (SMB)

**STIPULATION AND ORDER GRANTING EXTENSION OF TIME
TO RESPOND TO ANSWER AND COUNTERCLAIMS**

WHEREAS, on November 26, 2010, Irving H. Picard, as trustee (the “Trustee”) for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and Bernard L. Madoff, filed a complaint in the above-captioned matter (the “Complaint”);

WHEREAS, the Trustee and the above-captioned defendant (“Defendant”) mutually agreed to several extensions of the date by which the Defendant could move, answer, or otherwise respond to the Complaint;

WHEREAS, on April 17, 2014, Defendant answered the Complaint and filed counterclaims against the Trustee (the “Answer and Counterclaims”);

WHEREAS, the Trustee and Defendant have agreed to extend the time by which the Trustee may move, answer, or otherwise respond to the Answer and Counterclaims.

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel herein, that,

1. The date by which the Trustee may move, answer, or otherwise respond to the Answer and Counterclaims in the above-captioned adversary proceeding is extended up to and including June 23, 2014.

2. Within 30 days after the Trustee files an answer to the Answer and Counterclaims, or the Court’s decision on a motion to dismiss the Answer and Counterclaims, whichever occurs later, in the above-captioned adversary proceeding, the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan.

3. The parties to this stipulation reserve all rights, claims and/or defenses they may have and entry into this stipulation shall not impair or otherwise affect any such rights, claims and/or defenses.

4. This stipulation may be executed in any number of counterparts and all such counterparts shall together constitute one and the same agreement.

Dated as of: May 12, 2014

BAKER & HOSTETLER LLP

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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

Dated: New York, New York
May 13th, 2014

SO ORDERED:

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE